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October 15, 2019

Via ECF

The Honorable Joseph A. Dickson, U.S.M.J. United States District Court Martin Luther King Jr. Federal Building and Courthouse 50 Walnut Street, Room MLK 2D Newark, New Jersey 07102

Re: Alejandro Morales v. Healthcare Revenue Recovery Group, LLC, et al.

Case No. 2:15-cv-08401-ES-JAD

Our File No.: 15-063

Dear Judge Dickson:

This firm represents the Plaintiff in the above-referenced matter. Plaintiff writes to respectfully request a fourteen-day extension to file a joint motion to seal.

Pursuant to the local rules, the deadline to file a motion to seal is today. However, additional time is needed for the parties to finalize the motion. Therefore, Plaintiff respectfully requests that the deadline to file a joint motion to seal be adjourned on or before November 1, 2019.

Plaintiff reached out to the Defendant for their consent to this request but have not received a response.

Thank you for Your Honor's time and courtesies in this matter.

Respectfully Submitted

<u>s/Evan Lehrer</u>Evan Lehrer, Esq.KIM LAW FIRM LLC

EL

cc: Philip D. Stern, Esq. (*via ECF*)
Andrew T. Thomasson, Esq. (*via ECF*)
Christian M. Scheuerman, Esq. (*via ECF*)